

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**PLAINTIFF'S MOTION FOR LEAVE TO FILE SURREPLY IN OPPOSITION TO
DEFENDANT'S MOTION FOR A PROTECTIVE ORDER**

Plaintiff, Singular Computing LLC ("Singular"), respectfully moves for leave to file a short surreply in opposition to defendant, Google LLC's ("Google"), Motion for a Protective Order. Dkt. No. 154.

As grounds for its request, Singular states that Google mischaracterizes and misstates the record on several points in support of its argument that Singular is allegedly to blame for Google's refusal to produce deponents in response to Singular's Notices of Deposition. The proposed surreply will briefly address those mischaracterizations and misstatements.

Accordingly, for the above reasons, Singular respectfully requests that leave be granted.

Dated: April 22, 2021

Respectfully submitted,

/s/ Paul J. Hayes

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ATTORNEYS FOR THE PLAINTIFF

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify, pursuant to L.R. 7.1(a)(2), that counsel for Singular made a reasonable and good faith effort to reach agreement with counsel for Singular on the matters set forth in this motion. Counsel for Google responded that it could not presently assent to the motion.

/s/ Paul J. Hayes

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Paul J. Hayes